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VIA E-FILING

April 2, 2025

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Sanchez v. EZ Parking, et al., 23 cv 4052

Dear Judge Scanlon:

I represent Plaintiff in the above-referenced matter. I write in response to the Court's February 3, 2025 Order regarding the submission of Rule 56.1 statements. I respectfully request an extension of time from the current April 4, 2025 deadline, until May 2, 2025. The reasons for Plaintiff's request are that I was just provided on Monday¹ with Defendant's proposed Rule 56.1 statement, and also need to clarify the proposed bases for Defendant's motion. Given my office's other commitments, I cannot prepare a counterstatement in the remaining allotted time. Defendants consent to this request, and request that the Court provide a deadline for Plaintiff's Counterstatement to be served upon Defendants as well as a deadline to file Defendants' letter motion for a pre-motion conference. I thank the Court for its consideration of Plaintiff's request.

Respectfully submitted,

/s/

Vincent E. Bauer

¹ Defendants sent me both their Rule 56.1 Statement of Facts in PDF format and a template draft of Plaintiff's Counterstatement with each statement listed in Word format in order to facilitate Plaintiff's response. Despite that limited bit of help, Plaintiff still needs more than four days to respond to what it took Defendant months to prepare.